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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

GREAT WEST CAPITAL, LLC,

Plaintiff,

v.

JACK PAYNE; JUNIPER MOUNTAIN
CATTLE, LLC (RACHEL PAYNE,
Manager), a Nevada limited liability company;
and NEVADA LIVESTOCK MARKETING,
LLC (RACHEL PAYNE, Manager), a Nevada
limited liability company,

Defendants.

Case No. 3:22-cv-00768-IM

**DECLARATION OF ARTHUR H.
BERG IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTION FOR LEAVE TO FILE
SECOND AMENDED ANSWER,
AFFIRMATIVE DEFENSES AND
COUNTERCLAIM**

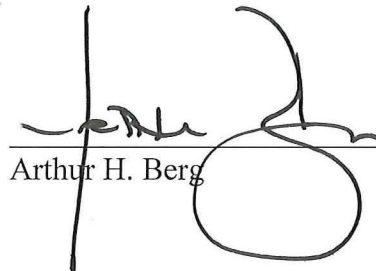
I, Arthur H. Berg, declare:

1. I am over the age of 18, and have personal knowledge of the facts set forth below, and could testify herein if called as witness.
2. My primary residence is located in Nevada.
3. I have a Nevada driver's license and am registered to vote in Nevada.

4. The above facts were true at the time I caused Great West Capital, LLC to file the Complaint that commenced this action, and at all relevant times before and after such date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of March 2023.


Arthur H. Berg